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Karen Goff, Executive Secretary

April 27, 2012

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**RE: Lifeline and Link Up Reform and Modernization - WC Docket No. 11-42  
Lifeline and Link Up - WC Docket No. 03-109  
Federal-State Joint Board on Universal Service - CC Docket No. 96-45  
Advancing Broadband Availability Through Digital Literacy Training - WC Docket No. 12-23**

Dear Secretary Dortch:

The West Virginia Library Commission (WVLC) respectfully writes in support of the comments submitted in this proceeding by the American Library Association (ALA) regarding increasing the capacity of libraries across the nation to support the digital literacy needs of their communities.

The West Virginia Library Commission promotes, assists, and supports the development of effective and efficient library services that ensure high quality library services and information resources to all residents of the state. There are currently 97 public library systems housed in 175 facilities across the state. Improving digital literacy is as vital to the mission of all these libraries and the future of the state as improving early literacy, functional literacy, information literacy and civics literacy. We believe providing digital literacy training, whether through formal classes or informal support mechanisms, is a critical service our libraries do and should offer. We believe savings from the Lifeline program could be effectively leveraged by public libraries to reach more people and to support new training in libraries that lack trainers and other resources to meet the digital literacy needs of their residents.

Libraries are primary points of public internet access; 41% of West Virginia households do not have broadband access and 26% do not have broadband access. No matter how many public computers are available, there are never enough. Even with wireless access in every public library facility, there are still people waiting for computers. Libraries need additional hardware to meet the need; the Kingwood Public Library has six computers for a service population of 20,000.

Libraries are also primary points of computer training. Many people who need to use the computers lack the necessary skills. Libraries schedule classes that teach basic computer skills and they instruct patrons individually. Libraries help people access and use employment resources and act as bridges between government and citizens. But there is not enough staff to deliver the needed training. The average number of staff in each public library facility is 3.6, not nearly enough to provide individual attention to those struggling with digital literacy. Last year 1,406,182 West Virginians used public access computers in the state's public libraries.

The comments of ALA articulate the concerns of the West Virginia Library Commission in considering how to increase the capacity of local libraries, as well as strategies for implementing a program that will result in a successful, scalable, and sustainable digital literacy program.



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The West Virginia Library Commission supports the following points made by ALA and requests their careful consideration. The West Virginia Library Commission:

- Is opposed to adding a digital literacy component to the E-rate program. E-rate discounts are a critical resource for our libraries' connectivity and infrastructure needs. West Virginia public libraries receive an average E-rate program discount of 75% on telecommunications and Internet access charges. E-rate has played a pivotal role in helping West Virginia libraries connect their users with the Internet. Today, 100% of West Virginia libraries offer Internet access to the public. This access enables libraries to share resources, assist students with practice tests and class assignments, and serve adults with employment and other forms. Without the discount, access would disappear in most of the state's public libraries. The program should not be altered to include digital literacy;
- Is opposed to a match requirement. Such a requirement would discourage many libraries from applying;
- Supports funding libraries that currently offer digital literacy training, in addition to those that do not currently offer training;
- Supports a minimum funding level of \$25,000 per entity per year and a two-year application cycle;
- Supports a flexible program design that includes state-wide consortium applications to maximize the number of libraries that could benefit from the initiative and minimize the burden on smaller libraries. Experience in other areas reinforces the opinion that consortium applications would likely support the most cost-effective implementation of the program; and
- Suggests that the FCC build on the experience of the National Telecommunications and Information Administration (NTIA) and the Institute of Museum and Library Services (IMLS) in developing the digital literacy program.

The West Virginia Library Commission thanks the Federal Communications Commission for its acknowledgement of the important role U.S. public libraries already play in supporting and advancing digital literacy. West Virginia's libraries stand ready to help achieve the FCC goal of increasing opportunities for the public to improve their digital literacy skills so that the benefits of broadband can truly be realized.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Karen Goff", is written over a light blue horizontal line.

Karen Goff, Secretary